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WILLS—DEATH OF BENEFICIARY—NEXT OF KIN.—The widow of a beneficiary is held, in *Re Devoe* (N. Y.) 57 L. R. A. 536, not to be entitled to share under a will directing that, in case of the death of a beneficiary before the time for distribution arrives, his share shall be paid over to his next of kin as, according to the statute of distributions, his personal estate would be divided and distributed.

As to legal signification of "next of kin," see 1 Va. Law Reg. 464.

VENDOR AND VENDEE—NATURE OF INTEREST OF EACH UNDER EXECUTORY CONTRACT.—The vendor's interest in a partially performed contract to purchase land of which the vendee has been put in possession is held, in *Bowen v. Lansing* (Mich.) 57 L. R. A. 643, to pass to his personal representative on his death, and not to be subject to execution for the debts of his heir.

The nature of the interest of vendor or vendee in a land contract, as real or personal property, is considered in a note to this case.

CONSTITUTIONAL LAW — EVIDENCE — SELF-CRIMINATION.—Merely exempting a witness in a criminal case from liability to have his testimony used against him in case he is subsequently prosecuted for an offense to which it relates is held, in *Re Carter* (Mo.) 57 L. R. A. 654, not to be sufficient to prevent his claiming the protection of a constitutional provision that no person shall be compelled to testify against himself in any criminal case.

See 2 Va. Law Reg. 117, where *Brown v. Walker*, 161 U. S. 591, is reviewed.

TAXATION—CHURCH PROPERTY—EXEMPTION.—The renting of a church parsonage, and using the rent to procure another residence for the parson, is held, in *Protestant Episcopal Church v. Prioleau* (S. C.) 57 L. R. A. 606, not to deprive it of its exemption from taxation, under a provision that exemption of parsonages shall not extend beyond the buildings and premises actually occupied as such.

Substantially the same conclusion was reached, as to property used for educational purposes, in *Staunton v. Seminary*, 99 Va. 653. See 7 Va. Law Reg. 507, 582.

STREETS—ABUTTING OWNERS—OBSTRUCTION.—The permanent obstruction of a street within 200 feet of the property of an abutting owner, cutting him off from his usual and only direct access to the business portion of the town, thereby depreciating the value of his property, is held, in *O'Brien v. Central Iron & Steel Co.* (Ind.) 57 L. R. A. 508, to inflict special injury on him, for which he may recover damages.

In *Meyer v. City of Richmond*, 172 U. S. 82, the right of a lot owner to recover consequential damages for the closing of a street not opposite his premises was denied. See 4 Va. Law Reg. 618.

DEEDS — CONDITIONS SUBSEQUENT — CONSTRUCTION — CHANCERY JURISDICTION.—In case of a conveyance by an aged parent to his son to secure